

**REMARKS**

Claims 8-17, 19 and 25-32 are pending. By this amendment, claims 1-7 and 18 are canceled, claims 8 and 19 are amended and claims 25-32 are added. No new matter has been added. Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

***Present Amendment is proper for entry***

Applicants respectfully submit that the instant amendment is proper for entry after final rejection. Applicants note that no question of new matter is presented nor are any new issues raised in entering the instant amendment of the claims and that no new search would be required. In particular, Applicants submit that the instant amendment places the application in condition for allowance consistent with the Examiner's indication of allowable subject matter. For example, as claim 8 has been amended to include the features of allowable claim 18, claims 8-16 should be allowed. Moreover, as claim 19 has been presented in independent form and as new claims 25-32 depend from claim 19, claims 19 and 25-32 should also be indicated as allowed. Thus, all pending claims are in condition for allowance. Accordingly, Applicants request the Examiner to enter the instant amendment, consider the merits of the same, and indicate the allowability of the present application and each of the pending claims.

***Allowed Claims***

Applicants appreciate the indication that claim 17 is allowed and that claims 18 and 19 contain allowable subject matter and would be allowed if presented in

independent form. Accordingly, as claim 8 has been amended to include the features of allowable claim 18, claims 8-16 should be indicated as being allowed. Moreover, as claim 19 has been presented in independent form and as new claims 25-32 depend from claim 19, claims 19 and 25-32 should be indicated as being allowed. Thus, all pending claims are in condition for allowance.

### ***35 U.S.C. §102(b) Rejections***

Claims 1, 5 and 7 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No.: 6,277,720 to DOSHI, *et al.* ("DOSHI").

Claims 8-14 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No.: 6,153,501 to BECKER ("DOSHI").

While Applicants respectfully disagree with each of these rejections, Applicants have, in an effort to advance prosecution of the allowed and allowable claims, canceled claims 1-7 and amended claim 8 to include the features of allowable claim 18, thereby rendering claims 8-16 in condition for allowance.

Thus, Applicants respectfully submit that each of these rejections has been rendered moot.

Accordingly, Applicants respectfully submit that the rejections under 35 U.S.C. § 102(b) should be withdrawn.

### ***35 U.S.C. § 103 Rejections***

Claims 2-4 and 6 are rejected under 35 U.S.C. §103(a) as being unpatentable over DOSHI in view of U.S. Patent No. 6,198,144 to PAN, *et al.* ("PAN").

Claims 15 and 16 are rejected under 35 U.S.C. §103(a) as being unpatentable over BECKER in view of PAN.

While Applicants respectfully disagree with each of these rejections, Applicants have, in an effort to advance prosecution of the allowed and allowable claims, canceled claims 1-7 and amended claim 8 to include the features of allowable claim 18, thereby rendering claims 8-16 in condition for allowance.

Thus, Applicants respectfully submit that each of these rejections has been rendered moot.

Accordingly, Applicants respectfully submit that the rejections under 35 U.S.C. § 103(a) should be withdrawn.

#### ***Comments on Reasons for Allowance***

In response to the Statement of Reasons for Allowance set forth in the Office Action, Applicants wish to clarify the record with respect to the basis for the patentability of the indicated claims in the present application. In this regard, while Applicants do not disagree with the Examiner's indication that certain identified features are not disclosed by the references, Applicants submit that the claims in the present application recite a combination of features, and that the basis for patentability of these claims is based on the totality of the recited features.

#### **CONCLUSION**

In view of the foregoing amendments and remarks, Applicants submit that all of

the claims are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue. The Examiner is invited to contact the undersigned at the telephone number listed below, if needed. Applicants hereby make a written conditional petition for extension of time, if required. Please charge any deficiencies in fees and credit any overpayment of fees to **IBM Deposit Account No. 09-0458**.

Respectfully submitted,  
Haining.S. YANG, et. al.



Andrew M. Calderon  
Reg. No. 38,093

November 21, 2005  
GREENBLUM & BERNSTEIN, P.L.C.  
1950 Roland Clarke Place  
Reston, VA 20191  
703-716-1191